

WRAP Conference Call Minutes
December 7, 2005, 10:00 am

Attendance:

Jennifer Carr - NDEP
Jean-Paul Huys - NDEP
Lori Campbell - NDEP
Bob Boyd - BLM
Pat Cummins – WGA/WRAP Project Manager
Duane Sikorski, Yann Linn - Washoe County
Ray Bacon – NV Manufactures Association
Russ Fields – NV Mining Association
Darrell Soyars – Sierra Pacific
Tim Rubald – NV Commissions on Economic Development
Dennis Ransel & Cheng Shih – Clark County

Jennifer Carr introduced the NDEP staff and noted that the presentation was available for download from the NDEP BAQP website. She then gave a summary of the letter dated March 15, 2005 regarding WRAP membership. She highlighted some of the concerns that stakeholders had previously made regarding the clean air corridor concept, and the WRAP consensus vote. Jennifer explained that being a member would give Nevada a vote (and often more importantly a “no vote”) at the WRAP board meeting. For Leo to be protective of Nevada position, we’d want him to be heard with an equal voice.

Ray Bacon was the first to comment. He stated that he still saw no advantage to joining the WRAP. He cited negative past history with the Grand Canyon Commission and is concerned that the ways of doing business had not changed. He also stated concern that the WGA would turn the implementation phase of the WRAP into a regional governmental agency, and that they were talking about other pollutants including mercury and climate changes.

Pat Cummins responded to many of Ray’s concerns. He stated that the mercury presentations that were being prepared for the board meeting is expected to be a one time thing at the request of the Tribes, as well as other past presentations regarding climate change. Pat said that the primary goal and the only funded goal for the WRAP are for visibility pollutants. Pat went on to state that Nevada has been treated the same as other states; the only difference is that they do not have a voice at the board. The statement was made that other than a vote, there is no particular additional disadvantage to joining.

In response to Ray Bacon’s concerns over other pollutants, Jennifer noted that the stakeholders may want to consider a “what if” scenario in which the WRAP does move beyond it’s current missions in the future. That may be an example of when Nevada may want or need to be head at the Board table.

Russ Fields was the next to comment. He stated that he agreed with Ray Bacon, that not joining would not cause a problem. He noted his concern about the consensus requirement, and that he would like to know more about that process. It was noted that the WRAP has bylaws that are available on-line. Russ also said that if the veto power exists at the WGA level, then we don't necessarily need it with the WRAP.

Bob Boyd spoke next citing the Federal viewpoint and that at the national level true collaboration is being encouraged. He said that the management standpoint is changing toward a culture of collaboration, although it will take time to be witnessed, the states voices are being recognized now, especially when they are together with a group like the WRAP.

Darrell Soyars noted that when the western utilities had issues with presumptive-BART, the WRAP provided a united front. He noted that the WRAP provided power for the western utilities over meeting NOX and p-BART limits vs the utility/state battling with EPA as an individual. Then he asked about a WRAP restructure as a result of the recent lawsuits. Pat Cummins responded that the WRAP is not a 309 extension of the Grand Canyon Commission and the lawsuits were against EPA, not the 309 states or the WRAP. Darrell concluded that he was still leaning toward the no side, but doesn't want to rely on negative history to make a current decision. He will likely discuss this more with Leo.

Duane Sikorski next spoke and stated that it seemed to him to be a "no brainer". That it would be in Nevada's best interest to have a "voice, veto". He thinks it is a good idea to join. He noted that the WRAP is a technical group and not a political body.

Tim Rubald said that he didn't see a down side to joining the WRAP in economical development, but wanted more time to come up to speed on these issues. He also pointed out that many of the Nevada Manufactures Association members are his clients and therefore the Nevada Commission on Economic Development wants to understand the concerns more fully.

Dennis Ransel stated that he felt that the WRAP process was very beneficial to the state and to address western issues. He felt it was inconsistent that the Governor was an active and highly recognized member of the WGA, yet to not allow his staff to have an active participation role in the WRAP Board. He would like to see Nevada have a more of an active role, a seat at the Board Meetings, and to even chair the Board someday. He did not feel that the old issues are at the forefront today and should influence this decision to become a member of the WRAP.

11:00 am - Darrell, Russ, and Ray left the call after this and stated that we should continue to revisit this topic. They encouraged NDEP staff to continue to participate and take advantage of all the good work that comes out of the WRAP.

The remaining stakeholders said that they were available to continue to hear about the projects updates.

Lori Campbell started with the status of the Emissions Projects.

- The 2002 base case EI is final. ERG, a consultant for the WRAP, has completed a quality assurance review of the 2002 inventory addressing completeness (i.e., geographic coverage, pollutant coverage, and control device information), and possible outliers (i.e., identified facility-, source category-, and county-level problems by comparing to other similar inventories). Also, changes submitted by state, local, and tribal agencies to EPA in June 2005 as part of the NEI review process have been incorporated.

(<http://www.wrapair.org/forums/ssjf/documents/eictts/index.html>)

- The 2018 baseline projections emissions inventory for point and area sources in the WRAP region are complete. These projections are based on the revised 2002 WRAP point and area sources inventory, and include impacts from demographic and economic growth, as well as post-2002 "on the books" controls (e.g., consent decrees, EACs, the Section 309 SO₂ Annex, etc.) and other adjustments (e.g., retirements and replacements) known as of December 2004, and reasonably expected to occur by the end of 2018.

(<http://www.wrapair.org/forums/ssjf/documents/eictts/projections.html>)

- The 2018 projections – scenarios. For existing coal power plants in the 11-state Western power grid, the initial control strategy scenario (A) is based on “known controls” and presumptive BART limits. This is not available on the web yet, Lori stated that she could forward information to anyone interested in seeing this projection scenario.

The next WRAP project that Lori discussed was regarding BART.

1. The BART guidelines that came out in June 15, 2005:

- Addressed the 2002 American Corn Growers case
- Included a final test for whether an alternative is “better than BART”
- Included final determination and language for CAIR greater than BART
- Did Not Include** guidance on trading programs that were removed due to the CEED vs EPA case. Therefore a “Trading Rule” was proposed to address “group BART”
- We are waiting to see what is published to address these additional issues.

2. WRAP Region BART Eligible List

Nevada BART Eligible Facilities:

1. SPPC – Sunrise Unit #1
2. SPPC – Reid-Gardner Units #1-#3
3. SPPC – Fort Churchill Units #1 & #2
4. SPPC – Tracy – Units #1 - #3
5. Southern Cal Edison – Mohave Units #1 & #2
6. Nevada Cement – Kiln #1 & #2
7. Chemical Lime – Kiln #3

(<http://www.wrapair.org/forums/ssjf/bartsources.html>)

3. Lori and Jean Paul previously did a survey of these BART eligible facilities to discuss how they would be interested in making reductions due to BART (if modeling shows it is

necessary). All of the facilities that we contacted stated that they would not be interested in some type of trading programs, but would prefer to address BART emissions reductions on a source-by-source basis.

Jean Paul Huys next discussed the Emissions and Attribution Modeling and some timeline information.

First, included in the final 2002 emission inventory are the offshore emissions on the West coast and the complete emissions inventories for CA.

The emissions modeling for the base year 2002 is ongoing and will be finished this year (2005), in addition, the source apportionment portion of the modeling will also be done. The regional modeling center will use a different way of calculating apportionment. They will probably use the CAMx model, which has the capability to define more source categories than the model they used previously (CMAQ).

The future year modeling (2018) will be completed by the end of March; also some of the BART scenarios will be done around the same timeframe.

Jennifer concluded the call, stating that we would keep the stakeholders informed of the continuing work being done by our staff along with the WRAP forums and committees. When appropriate, NDEP would plan another meeting to give everyone an update on the progress of regional haze SIP.